1 2 3 4 5	RACHAEL E. STEWART, ESQ. Nevada Bar No. 14122 Law Office of Rachael E. Stewart 400 S. 4 th Street, Suite 500 Las Vegas, Nevada 89101 Telephone: (702) 772-3260 Facsimile: (702) 552-4761 restewartlaw@gmail.com Attorney for Jahova Bell			
6	UNITED STATES DISTRICT COURT			
7	DISTRICT OF NEVADA			
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10 11	UNITED STATES OF AMERICA, Plaintiff,) CASE NO: 2:24-cr-00075-JAD-DJA-3		
12	VS.	STIPULATION TO CONTINUE		
13	JAHOVA BELL,) ARRAIGNMENT AND PLEA HEARING		
14	Defendant.	(First Request)		
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17				
18	IT IS HEREBY STIPULATED AND A	AGREED by JAHOVA BELL, by and through		
19	his attorney, RACHAEL E. STEWART, ESQ., and the United States of America, by and			
20	through JASON M. FRIERSON, United States Attorney for the District of Nevada, and			
21	DANIEL J. COWHIG, Assistant United States Attorney, that the arraignment and plea			
22	hearing scheduled for April 16, 2024, be continued to April 26, 2024, if that date is available			
23	to the Court.			
24	The request for a continuance is based to	upon the following:		
25	1	heduled for April 16, 2024. Counsel for Mr.		
26	1	xisting conflict on that date that cannot be with Counsel for the Government and court		
27	staff, the parties request that the	arraignment and plea be rescheduled to April		
20	26, 2024.			

The Government has no objection to the continuance.

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1	3. Mr. Bell is not in custody, and he does not object to the continuance.			
2	4.	The additional time	e sought herein is not sought for the purposes of delay.	
3	5.	Denial of this reque	est for continuance could result in a miscarriage of justice.	
4 5		The additional time	e requested by this Stipulation is excludable in computing ch the trial herein must commence pursuant to the Speedy	
6		Trial Act, Title 18,	United States Code, Section 3161(h)(7)(A), considering	
7			tle 18, United States Code, Section 3161(h)(7)(B)(i), (iv).	
8	6. This is the first request to continue defendant Bell's arraignment filed herein			
9	DATED: April 11, 2024			
10	Respectfully submitted,			
11			JASON M. FRIERSON United States Attorney	
12	/s/ Rachael E	E. Stewart	/s/ Daniel J. Cowhig	
13	Rachael E. Stewart, Esq. 400 S. 4 th Street, Suite 500 Las Vegas, Nevada 89101 <i>Counsel for Jahova Bell</i>		Daniel J. Cowhig Assistant United States Attorney	
14			501 Las Vegas Boulevard, Suite 1100 Las Vegas, Nevada 89101	
15	Counsel for 5	ипочи Бен	Counsel for the United States of America	
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1 2 3 4 5	Nevada Bar N	f Rachael E. Stewart cet, Suite 500 evada 89101 (02) 772-3260 (02) 552-4761 (1) gmail.com			
6	UNITED STATES DISTRICT COURT				
7	DISTRICT OF NEVADA				
8		•			
9	UNITED STA	ATES OF AMERICA,))) CASE NO: 2:24-cr-00075-JAD-DJA-3		
10		Plaintiff,) CASE NO. 2.24-CI-00075-JAD-DJA-5		
11		VS.	ORDER		
12	JAHOVA BELL, Defendant.		(First Request)		
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16					
17		<u>FINDINGS</u>	S OF FACT		
18	Pagad	I on the nending Stipulation of co	unsel, and good cause appearing therefore, the		
19	Court finds:	on the pending Supulation of co	unser, and good cause appearing meretore, me		
20	1.	The arraignment is currently sch	neduled for April 16, 2024. Counsel for Mr.		
21	Bell has an unavoidable pre-existing conflict on that date that cannot be rescheduled. After conferring with Counsel for the Government and court staff, the parties request that the arraignment and plea be rescheduled to April				
22					
23		26, 2024.			
24	2.	The Government has no objection	on to the continuance.		
25	3.	3. Mr. Bell is not in custody, and he does not object to the continuance.			
26	4.	The additional time sought herei	n is not sought for the purposes of delay.		
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- 5. Denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
- 6. This is the first request to continue defendant Bell's arraignment filed herein.

CONCLUSION OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the defendant sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code §§ 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv) and 3161(h)(1)(D).

ORDER

IT IS SO ORDERED that the arraignment and plea hearing currently scheduled for April 16, 2024, at the hour of 1:00 p.m. be vacated and continued to April 26, 2024, at the hour of 2:30 p.m.

DATED this 12th day of April, 2024.

Hon. Maximiliano D. Couvillier III

UNITED STATES MAGISTRATE JUDGE